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March 6, 2024

**VIA ECF**

Hon. Orelia Merchant, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201-1804

**Re: Stidhum v. 161-10 Hillside Auto Ave, LLC, et al.**  
**Case No.: 1:21-cv-7163 (OEM)(LB)**  
**MLLG File No.: 94-2019**

Dear Judge Merchant:

This firm represents the Defendants in the above-referenced matter. This letter shall serve as Defendants' request for an extension of their deadline to serve a reply in further support of their Motion for Summary Judgment (and file the fully briefed motion) from March 13, 2024 until March 27, 2024.

The basis for the request is that the lead attorney handling this matter, Emanuel Kataev ("Kataev"), left the firm abruptly in late January 2024, causing a backlog to the caseload of attorneys at the firm. Moreover, due to the procedural posture of the case, it has proven a sizeable task to get acquainted with the evidentiary record and underlying documents that have been served with respect to the pending motion. Exacerbating the issue for the undersigned are recent childcare issues that have required me to stay home as a caregiver for my children. The additional two (2) weeks will provide adequate time for Defendants to serve their reply and file the fully briefed Motion for Summary Judgment with the Court.

Plaintiff consents to the extension. Defendants have not requested an extension of this deadline. However, the entire briefing schedule was previously extended on October 31, 2023 and Plaintiff requested an extension of time to serve her opposition on January 2, 2024 (both of which were prior to Kataev's departure from this firm). The extension does not affect any other deadlines or appearances in this matter.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Matthew A. Brown

cc: all counsel of record (via ECF)